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VIA ECF

Hon. James R. Cho
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

***Re: Bedoya v. NYC Citrus LLC, et al. (20-cv-548)(EK)(JRC)
Letter Motion – Request to Extend Discovery Deadline***

Dear Judge Cho,

We represent Defendants in the above-referenced matter. The Parties jointly submit this request to extend the fact discovery deadline to January 31, 2022. The Court previously granted an extension of the fact discovery deadline until December 1, 2021. The parties attempted to schedule depositions, however Defendants are unavailable for depositions until January 2022 due to private medical issues as well as holiday business issues which require the individual Defendant's sole attention.

As a result, Defendants requested that depositions take place in January 2022, to which Plaintiff consents. Tentatively, the Parties have exchanged dates in January 2022 for depositions and these dates should be finalized by the beginning of next week. The Parties have further agreed that the depositions will be conducted remotely.

For the above mentioned reasons, the Parties request that the fact discovery deadline be extended until, and including, January 31, 2022. No parties will be prejudiced by this request.

We thank the Court for its time and attention.

Respectfully submitted,
/s/ Joey Tsai
Joey Tsai
Attorney for Defendants

cc: Amit Kumar, Esq. (VIA ECF)